

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

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CONGHUA YAN,

Plaintiff,

v.

THE STATE BAR OF TEXAS, a private  
company,  
THE BARROWS FIRM, a private company,  
LESLIE STARR BARROWS, in individual  
capacity, as member of the State Bar of  
Texas,  
WILLIAM ALBERT PIGG in individual  
capacity, as member of the State Bar of  
Texas,  
SAMANTHA YBARRA, in individual  
capacity, as member of the State Bar of  
Texas,  
LUIS JESUS MARIN, in individual  
capacity, as member of the State Bar of  
Texas, and official capacity as Assistant  
Disciplinary Counsel for the Office of the  
CDC,  
DANIEL EULALIO MARTINEZ, in  
individual capacity, as member of the State  
Bar of Texas, and official capacity as  
Assistant Disciplinary Counsel for the Office  
of the CDC,  
RACHEL ANN CRAIG, in individual  
capacity, as member of the State Bar of  
Texas, and official capacity as Associated  
Judge,  
TARRANT COUNTY,

Defendants.

CIVIL ACTION NO. 4:23-cv-00758-P-BJ

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**DEFENDANT SAMANTHA YBARRA’S MOTION FOR EXTENSION OF DEADLINE  
TO RESPOND TO PLAINTIFF’S SECOND AMENDED COMPLAINT**

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Defendant Samantha Ybarra (“Ybarra”) files this Motion for Extension of Deadline to Respond to Plaintiff’s Second Amended Complaint and respectfully request that the Court extend the deadline for her to answer or otherwise respond to Plaintiff’s Second Amended Complaint [Dkt. 48] until September 25, 2023, and in support thereof states as follows:

1. Plaintiff filed his Original Complaint on July 21, 2023. *See* Dkt. 1.
2. Ybarra was not served until August 24, 2023. *See* Dkt. 29.
3. Plaintiff filed his Second Amended Complaint on September 8, 2023. *See* Dkt. 48.
4. On September 11, 2023, Ybarra’s counsel emailed Pro Se Plaintiff at the email address provided on the Court’s docket requesting an extension from Plaintiff to file a response to Plaintiff’s Second Amended Complaint.
5. At the time of this filing, Plaintiff has not responded to Ybarra’s counsel’s request for extension.
6. Thus, Ybarra respectfully requests that the Court grant her an extension of time to file an answer or otherwise respond to Plaintiff’s Second Amended Complaint until September 25, 2023.

WHEREFORE Ybarra respectfully requests that the Court grant this Motion for Extension of Deadline to Respond to Plaintiff’s Second Amended Complaint and enter her proposed order extending the deadline for her answer or otherwise respond to Plaintiff’s Second Amended Complaint until and including September 25, 2023, and for such other and further relief to which Ybarra may be justly entitled.

DATED: September 12, 2023.

Respectfully submitted,

/s/ Roland K. Johnson

Roland K. Johnson

TX State Bar No. 00000084

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Caroline M. Cyrier

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**ATTORNEYS FOR DEFENDANT  
SAMANTHA YBARRA**

**CERTIFICATE OF CONFERENCE**

I certify that on September 11, 2023, I emailed Plaintiff at the email address provided to the Court. At the time of this filing, Plaintiff has not responded to the extension requested herein.

/s/ Caroline M. Cyrier

Caroline M. Cyrier

**CERTIFICATE OF SERVICE**

I hereby certify that on September 12, 2023, a true and correct copy of Defendant Samantha Ybarra's Motion for Extension of Deadline to Respond to Plaintiff's Second Amended Complaint was served on all counsel of record and parties not represented by counsel, via ECF.

/s/ Caroline M. Cyrier

Caroline M. Cyrier